

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

- against -

No. 22 Civ. 1115 (LGS)

ROBERT LENARD BOOTH, a/k/a TREVOR
NICHOLAS, DANIEL T. WELLCOME JR.,
MICHAEL D'URSO, ANTONELLA
CHIARAMONTE, ALYSSA D'URSO, and JAY
GARNOCK,

Defendants,

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PLEASE TAKE NOTICE that upon the Complaint in the above-captioned action; the Indictment in criminal case *United States v. Robert Lenard Booth, et al.*, S1 21 Cr. 652 (JSR); and the accompanying memorandum of law, the United States of America, by its attorney Damian Williams, United States Attorney for the Southern District of New York, hereby moves this Court under Rule 24 of the Federal Rules of Civil Procedure, for an order authorizing intervention by the United States and staying civil proceedings until the conclusion of the parallel criminal case, *United States v. Robert Lenard Booth, et al.*, S1 21 Cr. 652 (JSR), and for such other relief as the court deems just and proper.

Dated: New York, New York
March 31, 2022

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By:



Andrew Jones
Assistant United States Attorney
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New York, New York 10007